

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al.,
Plaintiffs

v.

JEFFREY DERDERIAN, et al.,
Defendants

C.A. No. 04-312L

**ANSWER OF THE DEFENDANT JACK RUSSELL TOURING, INC. TO THE
PLAINTIFFS' FIRST AMENDED MASTER COMPLAINT**

The Defendant Jack Russell Touring, Inc. ("JRT") hereby responds to the numbered paragraphs of the Plaintiffs' First Amended Master Complaint (the "Master Complaint") in accordance with Fed. R. Civ. P. 8 and 12 as follows:

Preliminary Statement

The Defendant Jack Russell ("Mr. Russell") has been the subject of past investigations by the Attorney General's Office of the State of Rhode Island concerning the Station Nightclub Fire, and has a reasonable and legitimate concern that he may be the subject of future investigations into such matters, which are included within the scope of the allegations of the Master Complaint. Mr. Russell has therefore exercised his rights under the Fifth Amendment of the United States Constitution and Article 1, Section 13 of the Rhode Island Constitution (the "Fifth Amendment Privilege") to the fullest extent possible in response to the Master Complaint, and has respectfully declined to answer the allegations contained in the Master Complaint for that reason. Consequently, JRT is unable to refer to or reply upon any knowledge or information that Mr. Russell may have about the events and matters alleged in the Master Complaint. Since

Mr. Russell is the principal shareholder and a principal of JRT, JRT will, in large part, be without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the Master Complaint. JRT specifically reserves its right to amend its answer, should these circumstances change.

Introduction

The allegations of the Plaintiffs' Introduction consist of conclusions of law and characterizations that require no response.

PARTIES

Plaintiffs

1. – 240. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

241 – 270. The Plaintiffs' have "reserved" paragraphs 241 through 270, and therefore JRT cannot respond to them at this time.

GENERAL ALLEGATIONS AS TO ALL DEFENDANTS

271. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

JEFFREY DERDERIAN

272. JRT repeats and incorporates by reference herein its responses to all prior paragraphs of the Master Complaint.

273. – 279 JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT I
JEFFREY DERDERIAN – NEGLIGENCE

280. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 279 of the Master Complaint.

281. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT II
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

282. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 279 of the Master Complaint.

283. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

MICHAEL DERDERIAN

284. - 286. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT III
MICHAEL DERDERIAN - NEGLIGENCE

287. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 284 through 286 of the Master Complaint.

288. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT IV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

289. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 284 through 286 of the Master Complaint.

290. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

DERCO, LLC

291. – 293. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT V
DERCO, LLC - NEGLIGENCE

294. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 291 through 293 of the Master Complaint.

295. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT VI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

296. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 291 through 293 of the Master Complaint.

297. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

HOWARD JULIAN

298. – 299. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT VII
HOWARD JULIAN - NEGLIGENCE

300. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 298 through 299 of the Master Complaint.

301. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT VIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

302. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 298 through 299 of the Master Complaint.

303. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

TRITON REALTY LIMITED PARTNERSHIP

304. – 307. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT IX
TRITON REALTY LIMITED PARTNERSHIP - NEGLIGENCE

308. JRT repeats and incorporates by reference herein its responses to all prior paragraphs 1 through 271 and 304 through 307 of the Master Complaint.

309. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT X
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

310. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 304 through 307 of the Master Complaint.

311. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

TRITON REALTY, INC.

312. – 315. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XI
TRITON REALTY, INC. - NEGLIGENCE

316. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 312 through 315 of the Master Complaint.

317. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

318. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 312 through 315 of the Master Complaint.

319. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

RAYMOND J. VILLANOVA

320. – 323. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XIII
RAYMOND J. VILLANOVA - NEGLIGENCE

324. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 320 through 323 of the Master Complaint.

325. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XIV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

326. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 320 through 323 of the Master Complaint.

327. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

JACK RUSSELL

328. JRT admits that Jack Russell is a resident of California. JRT states that it is without knowledge or information sufficient to form of a belief as to the truth of the remaining allegations of this paragraph.

329. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

330. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

331. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XV
JACK RUSSELL - NEGLIGENCE

332. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 328 through 331 of the Master Complaint.

333. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XVI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

334. In response to the allegations of the first sentence of this paragraph, JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 328 through 331 of the Master Complaint. JRT states that the remaining allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of this paragraph.

JACK RUSSELL TOURING, INC.

335. JRT admits that Jack Russell Touring, Inc. is a California corporation that had retained Mark Kendall, David Filice and Eric Powers as independent contractors in February of 2003. JRT states that the remaining allegations of this paragraph are conclusions of law that require no response. To the extent that the remaining allegations of this paragraph require a response, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of this paragraph.

336. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

337. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

338. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

339. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XVII
JACK RUSSELL TOURING, INC. - NEGLIGENCE

340. JRT repeats and incorporates by reference herein its responses to all prior paragraphs 1 through 271 and 335 through 339 of the Master Complaint.

341. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XVIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

342. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 335 through 339 of the Master Complaint.

343. JRT states that the allegations of this paragraph are conclusions of law that require no response. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

PAUL WOOLNOUGH

344. – 347. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XIX
PAUL WOOLNOUGH - NEGLIGENCE

348. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 344 through 347 of the Master Complaint.

349. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

350. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 344 through 347 of the Master Complaint.

351. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

MANIC MUSIC MANAGEMENT, INC.

352. – 355. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXI
MANIC MUSIC MANAGEMENT, INC. - NEGLIGENCE

356. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 352 through 355 of the Master Complaint.

357. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

358. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 352 through 355 of the Master Complaint.

359. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

KNIGHT RECORDS, INC.

360. – 363. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXIII
KNIGHT RECORDS, INC. - NEGLIGENCE

364. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 360 through 363 of the Master Complaint.

365. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXIV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

366. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 360 through 363 of the Master Complaint.

367. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

DANIEL BIECHELE

368. JRT admits that Daniel Biechele is a resident of the State of California and was the tour manager for the Great White Tour. The remaining allegations of this paragraph are primarily conclusions of law to which no response is required. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of this paragraph.

369. – 370. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to individuals other than JRT, or (ii) conclusions of law to which no response is required.

371. The allegations of this paragraph are primarily conclusions of law to which no response is required. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XXV
DANIEL BIECHELE - NEGLIGENCE

372. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 368 through 371 of the Master Complaint.

373. The allegations of this paragraph are primarily conclusions of law to which no response is required. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

COUNT XXVI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

374. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 368 through 371 of the Master Complaint.

375. The allegations of this paragraph are primarily conclusions of law to which no response is required. To the extent that a response is required, JRT states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph.

ANHEUSER-BUSCH, INCORPORATED AND
ANHEUSER-BUSCH COMPANIES, INCORPORATED

376. – 384. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXVII
ANHEUSER-BUSCH - NEGLIGENCE

385. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 376 through 384 of the Master Complaint.

386. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

MCLAUGHLIN & MORAN

387. – 392. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

XXVIII
MCLAUGHLIN & MORAN, INC. - NEGLIGENCE

393. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 387 through 392 of the Master Complaint.

394. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

WHJY, INC. AND CAPSTAR RADIO OPERATING COMPANY

395. – 402. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXIX
WHJY, INC. AND/OR CAPSTAR - NEGLIGENCE

403. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 395 through 402 of the Master Complaint.

404. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

CLEAR CHANNEL BROADCASTING, INC.

405. – 408. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXX
CLEAR CHANNEL BROADCASTING, INC. - NEGLIGENCE

409. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 395 through 408 of the Master Complaint.

410. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

DENIS P. LAROCQUE, ANTHONY BETTENCOURT AND MALCOLM MOORE, IN HIS CAPACITY AS FINANCE DIRECTOR OF THE TOWN OF WEST WARWICK

411. – 425. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXI
MALCOLM MOORE, IN HIS CAPACITY AS FINANCE DIRECTOR OF THE TOWN OF WEST WARWICK - NEGLIGENCE

426. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 411 through 425 of the Master Complaint.

427. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXII
DENIS P. LAROCQUE, FIRE INSPECTOR - NEGLIGENCE

428. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 411 through 425 of the Master Complaint.

429. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

430. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 411 through 425 of the Master Complaint.

431. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXIV
ANTHONY BETTENCOURT - NEGLIGENCE

432. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 411 through 425 of the Master Complaint.

433. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

STATE OF RHODE ISLAND AND
IRVING J. OWENS, FIRE MARSHAL

434. – 436. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXV
STATE OF RHODE ISLAND - NEGLIGENCE

437. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 434 through 436 of the Master Complaint.

438. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXVI
IRVING J. OWENS - NEGLIGENCE

439. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 434 through 436 of the Master Complaint.

440. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

BRIAN BUTLER

441. – 444. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXVII
BRIAN BUTLER - NEGLIGENCE

445. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 441 through 444 of the Master Complaint.

446. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

TVL BROADCASTING, INC.

447. – 450. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXVIII
TLV BROADCASTING, INC. - NEGLIGENCE

451. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 279, 441 through 444, and 447 through 450 of the Master Complaint.

452. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

STC BROADCASTING, INC.

453. – 456. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XXXIX
STC BROADCASTING, INC. - NEGLIGENCE

457. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 279, 441 through 444 and 453 through 456 of the Master Complaint.

458. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

BARRY H. WARNER

459. – 464. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XL
BARRY H. WARNER - NEGLIGENCE

465. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 459 through 464 of the Master Complaint.

466. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

467. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 459 through 464 of the Master Complaint.

468. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLII
LUNA TECH, INC. – NEGLIGENCE

469. – 472. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLIII
LUNA TECH, INC. – STRICT LIABILITY

473. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 468 through 471 of the Master Complaint.

474. – 477. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLIV
LUNA TECH, INC. – BREACH OF WARRANTY

478. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 469 through 472 of the Master Complaint.

479. – 480. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLV
HIGH TECH SPECIAL EFFECTS, INC. - NEGLIGENCE

481. – 484. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLVI
HIGH TECH SPECIAL EFFECTS, INC.
STRICT LIABILITY

485. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 481 through 484 of the Master Complaint.

486. – 489. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLVII
HIGH TECH SPECIAL EFFECTS, INC. – BREACH OF WARRANTY

490. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 481 through 484 of the Master Complaint.

491. – 492. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLVIII
AMERICAN FOAM CORPORATION - NEGLIGENCE

493. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 of the Master Complaint.

494. – 498. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT XLIX
AMERICAN FOAM CORPORATION
STRICT LIABILITY

499. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 492 through 497 of the Master Complaint.

500. – 503. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT L
AMERICAN FOAM CORPORATION – BREACH OF WARRANTY

504. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 493 through 498 of the Master Complaint.

505. – 506. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LI
LEGGETT & PLATT INCORPORATED - NEGLIGENCE

507. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 513 through 532 of the Master Complaint.

508. – 511. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LII
LEGGETT & PLATT INCORPORATED
STRICT LIABILITY

512. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 508 through 511 of the Master Complaint.

513. – 532. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LIII
LEGGETT & PLATT INCORPORATED – BREACH OF WARRANTY

533. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 513 through 532 of the Master Complaint.

534. – 535. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LIV
L & P FINANCIAL SERVICES CO. - NEGLIGENCE

536. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 541 through 560 of the Master Complaint.

537. – 539. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LV
L & P FINANCIAL SERVICES CO. – STRICT LIABILITY

540. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 537 through 539 of the Master Complaint.

541. – 560. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LVI
L & P FINANCIAL SERVICES CO. – BREACH OF WARRANTY

561. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 541 through 560 of the Master Complaint.

562. – 563. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LVII
GENERAL FOAM CORPORATION - NEGLIGENCE

564. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 569 through 588 of the Master Complaint.

565. – 567. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LVIII
GENERAL FOAM CORPORATION – STRICT LIABILITY

568. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 564 through 567 of the Master Complaint.

569. – 588. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LIX
GENERAL FOAM CORPORATION – BREACH OF WARRANTY

589. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 569 through 588 of the Master Complaint.

590. – 591. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LX
GFC FOAM, LLC - NEGLIGENCE

592. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 598 through 617 of the Master Complaint.

593. – 596. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXI
GFC FOAM, LLC – STRICT LIABILITY

597. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 593 through 596 of the Master Complaint.

598. – 617. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXII
GFC FOAM, LLC – BREACH OF WARRANTY

618. JRT repeats and incorporates by reference herein his responses to paragraphs 1 through 271 and 598 through 617 of the Master Complaint.

619. – 620. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXIII
FOAMEX LP – SUCCESSOR LIABILITY FOR GENERAL FOAM CORPORATION

621. JRT repeats and incorporates by reference herein his responses to paragraphs 1 through 271 and 568 through 591 of the Master Complaint.

622. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXIV
FOAMEX INTERNATIONAL, INC. – LIABILITY FOR FOAMEX LP

623. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 621 through 622 of the Master Complaint.

624. – 625. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXV
FMXI, INC. – LIABILITY AS GENERAL PARTNER

626. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 621 through 622 of the Master Complaint.

627. – 628. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXVI
PMC, INC.

629. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 564 through 591 of the Master Complaint.

630. – 631. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXVII
PMC GLOBAL, INC.

632. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 629 through 631 of the Master Complaint.

633. – 634. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXVIII
JBL INCORPORATED F/K/A JAMES B. LANSING SOUND
INCORPORATED D/B/A JBL PROFESSIONAL – NEGLIGENCE

635. – 643. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXIX
JBL INCORPORATED – STRICT LIABILITY

644. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 635 through 643 of the Master Complaint.

645. – 648. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXX
JBL INCORORATED – BREACH OF WARRANTY

649. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 635 through 643 of the Master Complaint.

650. – 651. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

**ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC. AND HIGH
CALIBER INSPECTIONS, INC.**

652. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 of the Master Complaint.

653. – 659. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

**COUNT LXXI
ESSEX INSURANCE COMPANY – NEGLIGENCE**

660. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 653 through 659 of the Master Complaint.

661. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

**COUNT LXXII
MULTI-STATE INSPECTIONS, INC. - NEGLIGENCE**

662. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 653 through 659 of the Master Complaint.

663. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXIII
HIGH CALIBER INSPECTIONS, INC. - NEGLIGENCE

664. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 653 through 659 of the Master Complaint.

665. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

UNDERWRITERS AT LLOYD'S, LONDON AND
GRESHAM & ASSOCIATES OF R.I., INC.

666. – 675. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXIV
UNDERWRITERS AT LLOYD'S, LONDON – NEGLIGENCE

676. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 666 through 675 of the Master Complaint.

677. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXV
GRESHAM & ASSOCIATES OF R.I., INC. - NEGLIGENCE

678. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 666 through 675 of the Master Complaint.

679. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

ABC BUS, INC. D/B/A ABC BUS LEASING, INC.

680. – 683. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXVI
ABC BUS, INC. D/B/A ABC BUS LEASING, INC. - NEGLIGENCE

684. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 680 through 683 of the Master Complaint.

685. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXVII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

686. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 680 through 683 of the Master Complaint.

687. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

SUPERSTAR SERVICES LLC

688. – 691. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXVIII
SUPERSTAR SERVICES LLC - NEGLIGENCE

692. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 688 through 691 of the Master Complaint.

693. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXIX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

694. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 688 through 691 of the Master Complaint.

695. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXX
“JOHN DOE” DEFENDANTS - NEGLIGENCE

696. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 of the Master Complaint.

697. – 701. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

COUNT LXXXI
“JOHN DOE” DEFENDANTS – STRICT LIABILITY

702. JRT repeats and incorporates by reference herein its responses to paragraphs 1 through 271 and 696 through 701 of the Master Complaint.

703. – 706. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of these paragraphs, which are either (i) directed to defendants other than JRT, or (ii) conclusions of law to which no response is required.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

This Defendant asserts the affirmative defense of lack of personal jurisdiction over it by this Court and the State Court from which this action was removed.

SECOND AFFIRMATIVE DEFENSE

If the Plaintiffs should prove that injuries and damages were sustained as alleged, such injuries and damages resulted from acts or omissions of third parties over whom this Defendant had no control or right of control.

THIRD AFFIRMATIVE DEFENSE

While the allegations of the Plaintiffs are denied with respect to negligence, statutory liability, strict liability, injury and damages, to the extent that the Plaintiffs may be able to prove the same, they were the result of intervening and/or interceding acts or superseding negligence on the part of third parties over which this Defendant had neither control nor right of control.

FOURTH AFFIRMATIVE DEFENSE

If the Plaintiffs suffered injuries or damages, as alleged, such injuries or damages were

caused by some person(s) or entity(ies) for whose conduct this Defendant was not and is not legally responsible.

FIFTH AFFIRMATIVE DEFENSE

This Defendant did not act individually or engage in concert of action with any one or more of the other defendants herein for the purpose of accomplishing an unlawful purpose or to accomplish some purpose, not in and of itself unlawful, by unlawful means. Nor did this Defendant join in or participate in any joint venture with any one or more of the other defendants herein. Accordingly, the Plaintiffs cannot recover against this Defendant under theories of civil conspiracy or joint venture liability.

SIXTH AFFIRMATIVE DEFENSE

The damages, if any, recovered by the Plaintiffs from the decedents' alleged wrongful deaths are prescribed and limited by the provisions of R.I. Gen. Laws §§ 10-7-1 through 10-7-4.

SEVENTH AFFIRMATIVE DEFENSE

This Defendant asserts the affirmative defense that the Complaint fails to state any claim against this Defendant upon which any relief, whether compensatory, exemplary, punitive or otherwise, can be granted.

EIGHTH AFFIRMATIVE DEFENSE

This Defendant asserts the affirmative defense that to the extent the Plaintiffs seek to impose punitive damages, any such claim for punitive damages would be unconstitutional under the United States Constitution and applicable provisions of the Rhode Island State Constitution and unlawful under applicable State statutes to the extent that, among other things: (1) a defendant's liability for punitive damages and the appropriate amount of punitive damages are not required to be established by clear and convincing evidence; (2) punitive damages are sought to be awarded without bifurcating the trial of all punitive damages issues; (3) any award of

punitive damages is sought with no predetermined limit, such as a maximum multiple of compensatory damages or a maximum amount on the amount of punitive damages that the court or a jury may impose; (4) any award of punitive damages is based on anything other than a defendant's alleged conduct in connection with the events at issue in this lawsuit; or (5) an award of punitive damages is sought for the purpose of compensating the Plaintiffs for elements of damage not otherwise recognizable by applicable State law.

NINTH AFFIRMATIVE DEFENSE

The Plaintiffs' claims are time-barred by the applicable Statute(s) of Limitations.

JURY DEMAND

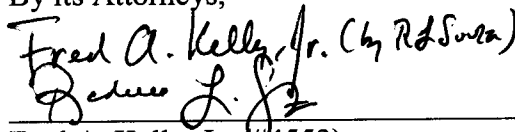
This Defendant demands a trial by jury on all issues so triable.

WHEREFORE, the Defendant, Jack Russell Touring, Inc., respectfully requests that:

- A. the Plaintiffs' First Amended Master Complaint be dismissed with prejudice as to it;
- B. Plaintiffs' demands for relief against it be denied in every respect; and
- C. the Court grant such other and further relief as may be just, proper and equitable.

JACK RUSSELL TOURING, INC.

By its Attorneys,



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Dated: January 7, 2005

CERTIFICATION OF SERVICE

I hereby certify that on the 7th day of January, 2005, I mailed a true copy of the within Answer of the Defendant Jack Russell Touring, Inc. to the Plaintiffs' First Amended Master Complaint via first-class mail, postage prepaid to all counsel of record listed on the attached service list.

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